U.S. Department of Justice



United States Attorney
Eastern District of New York

JM:SA

F.#2004R01762

271 Cadman Plaza East Brooklyn, New York 11201

June 29, 2012

BY EMAIL AND ECF

The Honorable Nicholas G. Garaufis United States District Judge Eastern District of New York 271 Cadman Plaza East Brooklyn, NY 11201 FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y

★ JUL 0 6 2012

BROOKLYN OFFICE

Re: United States v. Ronell Wilson, Criminal Docket No. 04-CR-1016 (NGG)

In light of the Court's denial of the government's motion to reconsider, the government respectfully requests that the Court authorize the government to appoint an Assistant United States Attorney from the United States Attorney's Office for the Eastern District of New York as "taint" counsel for these proceedings. As the Court is aware, the previously assigned "taint" counsel from the United States Attorney's Office for the Southern District of New York is no longer available to work on this matter. Given that the defendant stands convicted of the charges in this matter, the government submits that the concerns that led the Court to previously appoint an out-of-district "taint" counsel no longer exist. Counsel for the defendant have indicated their consent to this appointment.

s/Nicholas G. Garaufis

Respectfully submitted,

LORETTA E. LYNCH United States Attorney

By

/s/
Shreve Ariail
James McGovern
Celia Cohen
Assistant U.S. Attorneys
(718) 254-6616/6293

cc: Counsel for the Defendant (By EMAIL and ECF)